

To: The National Organic Standards Board
Aug 12, 2005

Comments on:
NOSB Livestock Committee Recommendation for Guidance on Pasture Requirements for the National Organic Program, July 12, 2005

Dear NOSB members,

The undersigned organizations welcome the clarifications the NOSB has proposed as guidance for organic pasture requirements. Once adopted the NOP can review and distribute these to accredited certifying agents and post them on the NOP website. This will help ensure consistency of interpretation and, along with recommended regulation changes, will help ensure ruminant livestock do graze on pasture in organic production systems.

We do suggest a few minor changes to improve clarity, and reflect language the Board originally adopted, unanimously, in October 2001.

Additions are underlined and red below, deletions in strikeout:

A. Organic System Plan

Ruminant livestock shall graze pasture during the months of the year when pasture can provide edible forage. The certified operation, as reflected in their Organic System Plan, shall have the goal of providing a significant portion of the total feed requirements as grazed feed, which means greater than 30% dry matter intake on an average daily basis during the growing season but not less than 120 days per year. Growing season means the time of year of that pasture growth is possible from natural precipitation or ~~manual-irrigation practice~~. The Organic System Plan shall include a timeline showing how the producer will satisfy the goal to maximize the pasture component of total feed used in the farm system. For livestock operations with ruminant animals, the operation's Organic System Plan shall describe: 1) the amount of pasture provided per animal; 2) the average amount of time that animals are grazed on a daily basis; 3) the portion of the total feed requirement that will be provided from pasture; 4) circumstances under which animals will be temporarily confined; and 5) the records that are maintained to demonstrate compliance with pasture requirements."

Comments:

1. The *Organic System Plan* is the vehicle to establish goals and timeline for the operation, but the farm operation is more accurately described as provider of feed.
2. “Significant portion of the total feed” describes the goal for the OSP, and was supported by the full Board in its Oct. 17, 2001 pasture recommendation.
3. “Per year” has been added for time frame clarity. Without this clarification, in areas with long or continuous growing seasons, the minimum grazing time might be applied to an interval longer than one year.
4. Wording in the growing season definition was modified to enhance comprehension.

We support the changes in Part C, which refers to NRCS practices standards as “a tool” that “can be” used instead of “shall be used.” It is important to retain the reference here to the Organic System Plan, as documentation that the certified operation has the goal of maximizing the significant portion of the total feed requirements provided by grazed feed. Otherwise, goals set under NRCS practice standards may not be compatible with organic systems.

C) Appropriate Pasture Conditions

As a tool for the farmer and the certifier, appropriate pasture conditions *can be* determined by referring to the regional Natural Resources Conservation Service Conservation Practice Standards for Prescribed Grazing (Code 528) for the number of animals in the Organic Systems Plan.

Thank you for considering these clarifications, and consulting so broadly with the organic community on this important topic.

Sincerely,

Andric Brook Farm
California Certified Organic Farmers (CCOF)
Center for Rural Affairs
Clover Stornetta Farms
The Cornucopia Institute
Demeter

FACT (Food Animal Concerns Trust), Chicago , Illinois
Family Farm Defenders
Midwest Organic Dairy Producers Association
Midwest Organic & Sustainable Education Service (MOSES)
National Cooperative Grocers Association
New England Small Farm Institute
Northeast Organic Dairy Producers Alliance
Organic Consumers Association
The Ohio Ecological Food and Farm Association
Rural Vermont, Montpelier
Sierra Club Arguello Group
Union of Concerned Scientists
Wisconsin Farmers Union

Ashland Food Cooperative, Ashland, OR
Brookings Natural Foods Co-op, Brookings, OR
Daily Groceries Co-op, Athens, Georgia
Hunger Mountain Co-op, Montpelier, VT
National Cooperative Grocers Association
People's Grocery Co-op, Manhattan, Kansas
River Market Community Co-op in Stillwater, MN
Tidal Creek Food Cooperative, Wilmington, NC